

MEMO# 29258

August 14, 2015

ICI Submits Comment Letter on FINRA's BrokerCheck Proposal

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TO: INTERNAL SALES MANAGERS ROUNDTABLE No. 9-15
SALES AND MARKETING COMMITTEE No. 7-15 RE: ICI SUBMITS COMMENT LETTER ON
FINRA'S BROKERCHECK PROPOSAL

Last month, the SEC issued notice of FINRA's filing of a proposed amendment to FINRA Rule 2210 (Communications with the Public) (the "Proposal"). [1] The Proposal would require FINRA member firms to include on each of their websites a readily apparent reference and hyperlink to BrokerCheck [2] on: (i) the initial webpage that the member intends retail investors to view; and (ii) any other webpage that includes a professional profile of one or more registered persons who conduct business with retail investors. [3] FINRA's objective is to increase awareness and use of BrokerCheck, which it believes will help investors make more informed choices about the individuals with whom and firms with which they may wish to conduct business.

In our comment letter submitted today (attached below), ICI supports the Proposal. The Proposal's scope is considerably narrower than those of the preceding 2013 and 2014 BrokerCheck proposals that were not adopted, because members' obligations to refer and link to BrokerCheck would be limited to certain places on their websites only. We believe the Proposal, if adopted, would advance FINRA's objective without imposing undue burdens on FINRA members.

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Counsel

[Attachment](#)

endnotes

[1] Notice of Filing of a Proposed Rule Change to Amend FINRA Rule 2210 (Communications with the Public), SEC Release No. 34-75377 (July 7, 2015), available at www.sec.gov/rules/sro/finra/2015/34-75377.pdf. See Institute [Memorandum](#) No. 29167,

dated July 10, 2015, for a summary of the Proposal and prior BrokerCheck proposals.

[\[2\]](#) BrokerCheck is a tool on FINRA's website that provides the public with information on the professional background, business practices, and conduct of FINRA member firms and their associated persons.

[\[3\]](#) These requirements would not apply to a member that does not provide products or services to retail investors, or a directory or list of registered persons limited to names and contact information.

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